Ethyl Petroleum Additives Sauget, Illinois 62201 (618) 274-4000



April 26, 1985

Mr. Dan Hopkins
On Scene Coordinator
U. S. E. P. A.
Region Five
230 South Dearborn St.
Chicago, IL 60604

Dear Mr. Hopkins:

We would like to proceed with a minor project at the EPAD facility which involves re-asphalting of some small areas and the installation of asphalt over some areas that are currently covered with crushed rock. The purpose of this letter is to supply you with details on this project and request your approval to proceed with same.

The attached drawing is a blow up of a portion of the Eastern section of our plant. You will be able to have a prospective for the exact areas involved by comparing this with the maps already in your possession. You will also note that on the drawing I have placed two red lines which represent the Southeast corner of the area previously indicated by you as the area of most concern. You will also note that the asphalting extends slightly into this area.

The details on the map show where rock will be grated down and the area asphalted over at the various points in the project. The project also involves pouring of a new cement curb and installation of a small catch basin.

On the map I have placed an "X" and a red circle. This "X" represents sample R-1 which was taken recently and analyzed for 2,3,7,8-TCDD. The result of the analysis indicated zero.

Based on the minor amount of work involved in this project, the fact little, if any, soil will be exposed, the fact that the area itself is not directly adjacent to previously determined areas of high concentration, an analysis showing zero in the area, we feel there will be no endangerment to personnel or the environment in completion of this project.

We respectfully request you review this information and respond with your recommendation/finding. Should you require additional discussion in this matter I will be available.

Sincerely,

James L. Sparks Environmental Technologist

JLS:dj

James L. Sparks
Environmental Technologist

JLS:dj

ETHYL LAW DEPT.

01:21 <u>9661-01-9</u>08

Mr. Dan Hopkins

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During the project trenches for the building foundation will be dug with backhoes. The soil removed will be transported via dumptruck to the area in the Northwest corner of our plant where previous contaminated soil was placed and covered. The new soil will be placed directly adjacent to the existing covered area and when all soil has been deposited it will be covered with approximately four inches of sand on top of which will be placed a three mil thick plastic cover. The area will then be covered with a second layer of sand approximately four inches thick which will be covered over by a final layer of crushed limestone rock approximately three inches thick.

Dumptrucks which are used to transport the soil will be taken to the decontamination pad where they will be thoroughly washed down prior to their leaving our facility. Likewise, the backhoes, once their work is completed, will be taken to the decontamination pad and washed down. In the case of the backhoes, the shovel, which is the only portion of the backhoe that will come into contact with contaminated soil, will be wrapped with plastic to insure no soil drops from the backhoe in route to the decontamination pad.

A backhoe may also be required to spread the dirt in the northeast corner of the plant prior to its being covered as indicated above. If during this spreading, the backhoe comes in contact with contaminated soil, it will be transported to the decontamination pad by use of a flat trailer, to again, prevent loss of soil while in route to the decontamination pad. The backhoe and flatbed truck will be decontaminated also.

Once the trench excavations are complete concrete will be poured continuously until all excavations are filled. Upon completion of this, any equipment or tools that may have been used will also be taken to the decontamination pad and thoroughly cleaned.

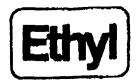
During the actual project work, workers will be issued clothing in the shower trailer. No personal clothing will be allowed in the job site. Standard personal protective equipment such as disposable coveralls, disposable gloves, disposable overshoes, full face respirators with filter elements, hard hats, safety glasses, outer Tyvek clothing, and rubber boots with steel toos will be worn by all personnel entering the job site. Additional personnel protective measures, such as showers and physical exams, will also be part of the project. For additional details you may want to review the health and safety plan previously submitted and utilized for the Unit 268 construction project. All measures described in that health and safety plan will be utilized during this project.

After the concrete work is completed no soil will remain exposed. At this time the temporary fence and shower trailer and any other equipment remaining from the project will be decontaminated and the project will proceed in a normal manner.

I believe this summarizes the project as per our recent phone conversation. In short, the project will be handled as was the Unit 268 construction project which was previously approved by you.

We would appreciate your response and approval as we would like to initiate and complete the project before warm weather sets in. Should you have any questions concerning this, please contact me.

adn. David Back John Park Baton Rouge Tower



April 26, 1985

Mr. Dan Hopkins On Scene Coordinator U.S. E.P.A. Region Five 230 South Dearborn St. Chicago, IL 60604

Dear Mr. Hopkins:

By this letter we are requesting your approval to proceed with the project for expansion of Compressor Building NT. The following information represents the manner in which the project will be completed and the measures that will be taken to mitigate the release or spreading of any 2,3,7,8-TCDD contaminated soil.

Building NT is located directly west of the black tank area and is shouthe maps presently in your possession. The expansion involves extend building and attached concrete pad to the north by approximately Eight feet. The project also involves installing a six foot square concrete and on the south end of the building.

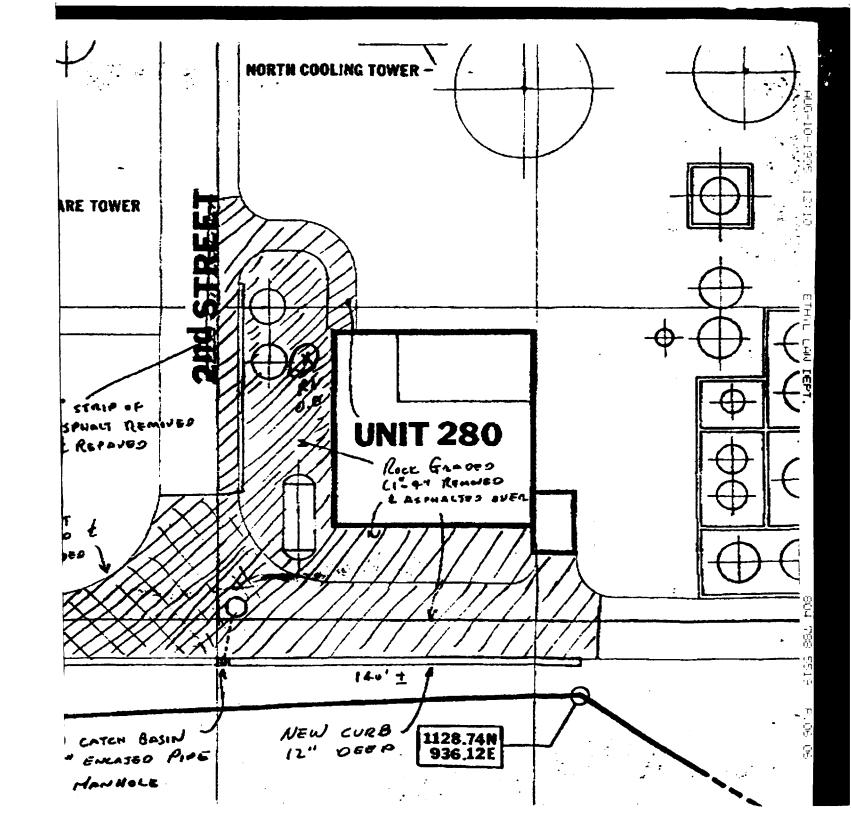
Digging for the concrete pad and foundations for the building extension involve digging to approximately three foot.

The previous analysis completed for this area showed 2,3,7,8-TCDD contamination at a level of 4.9 parts per billion.

Prior to actual start of the construction the following items will be completed as part of the prepatory work for the project.

- 1. A six inch high asphalt curb will be installed on the concrete pad north of Building NV. This contained area will be used as the decontamination area for equipment and is the same area used for the previous project.

 A sump will be installed in the decontamination area and water generated during washdown of equipment will be pumped to Tank 35-0530. This is the same tank which currently contains water from the previous project.
- 2. The shower trailer will be located at the NT construction site and a temporary fence will be installed around the complete worksite area.



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